

# TRAUB LIEBERMAN

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September 19, 2022

*Via ECF Only*

Hon. Katharine H. Parker, U.S.M.J.  
U.S. District Courthouse  
500 Pearl Street, Room 750  
New York, New York 10007

Re: *Graham Chase Robinson v. Robert De Niro et al.*  
Civil Action No.: 19cv9156 (LJL) (KHP) (the “Action”)

Dear Judge Parker:

Defendants submit this status letter to the Court in partial compliance with the Court’s September 12, 2022 Order (Dkt. No. 259) (the “Order”).

In furtherance of the Order, on September 14, Defendants’ counsel advised Plaintiff’s counsel that the Defendants would adopt the Court’s suggested neutral stipulation that accommodated and balanced all interests. Also on September 14, Defendants renewed their offer to stipulate to a “greater than” amount for Mr. De Niro’s net worth and provided counsel with an amount. Just this morning – the deadline for submitting a joint status letter to the Court – Plaintiff’s counsel declined Defendants’ proposals.

Additionally, a new issue emerged since issuance of the Order. At 4:58 p.m. this past Friday, September 16, Plaintiff’s counsel “data-dumped” their Seventeenth Document Production on Defendants’ counsel. When downloaded, counsel learned this production consisted of 1.13 GB of data and 2,395 documents in more than 6,000 pages. No prior indication had been given that any additional production was necessary, underway, or forthcoming.

Hon. Katharine H. Parker, U.S.M.J.  
September 19, 2022  
Page 2

Notwithstanding the above disagreements, the undersigned worked in good faith with Plaintiff's counsel in an attempt to agree on submitting a joint status update to the Court. Unfortunately, the parties have not agreed on a joint letter at this time. Defendants' counsel will continue to work with Plaintiff's counsel to agree on a joint letter to be filed with the Court tomorrow.

We thank the Court for its consideration of the above.

Respectfully submitted,

**TARTER KRINSKY & DROGIN LLP**

*/s/ Laurent S. Drogin and*  
*/s/ Brittany K. Lazzaro* \_\_\_\_\_

**TRAUB LIEBERMAN STRAUS  
& SHREWSBERRY LLP**

*/s/ Gregory R. Bennett*